



**MILLER NASH**<sup>LLP</sup>  
ATTORNEYS AT LAW

PORTLAND, OREGON  
SEATTLE, WASHINGTON  
VANCOUVER, WASHINGTON  
CENTRAL OREGON  
WWW.MILLERNASH.COM

4400 Two Union Square  
601 Union Street  
Seattle, Washington 98101-2352  
OFFICE 206.622.8484  
FAX 206.622.7485

David L. Rice, P.C.  
david.rice@millernash.com  
(206) 777-7424 direct line

February 26, 2010

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 - 12th Street S.W.  
Washington, D.C. 20554

Subject: Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
Covering Calendar Year 2009  
EB Docket No. 06-36  
Telmate, LLC

Dear Ms. Dortch:

Telmate, LLC, by its attorneys and pursuant to Section 64.2009(e) of the Commission's rules, hereby submits its 2009 CPNI Certification and Accompanying Statement.

If there are any questions regarding this submission, please contact the undersigned.

Very truly yours,



David L. Rice

Enclosures  
cc: Best Copy and Printing, Inc.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date Filed: February 26, 2010

Name of Company covered by this certification: Telmate, LLC

Name of signatory: Richard Torgersrud; CEO

Title of Signatory: CEO

I, Richard Torgersrud, CEO, certify that I am an officer of Telmate, LLC and I have personal knowledge that Telmate, LLC has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Telmate, LLC procedures ensure the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, and an explanation of actions, if any, taken against data brokers and a summary of customer complaints received in 2009 concerning the unauthorized release of CPNI.

Signed 

## **Customer Proprietary Network Information (CPNI) Compliance Procedures**

Telmate, LLC – ("Telmate") has established and implemented the following internal policies and procedures to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), codified at 47 C.F.R. § 64.2001 et seq.

The following operating procedures ensure that Telmate is in compliance with the FCC's CPNI Rules:

Telmate does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by law. Telmate only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. Telmate has taken no action against data brokers and has received no customer complaints in the last year concerning the unauthorized release of CPNI. Telmate does not use its customers' CPNI for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F.R. § 64.2001 et seq.

Telmate has practices and procedures that govern the disclosure of CPNI:

- a. Telmate does not disclose or release CPNI upon a customer's telephone request unless password credentials are authenticated.
- b. Telmate does not disclose or release CPNI through online access over the Internet.
- c. Telmate does not have any retail locations where a customer can obtain CPNI.
- d. With respect to telephone inquiries by customers concerning specific call-related issues, Telmate requires the customer to provide sufficient specific information about the call in question to confirm the customer's identity.
- e. Telmate automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.
- f. Telmate is prepared to notify the required U.S. government agencies, within 7 days, in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.

Telmate provides training to all relevant employees on the company's practices and procedures that protect CPNI and its misuse upon hire and annually, at a minimum.

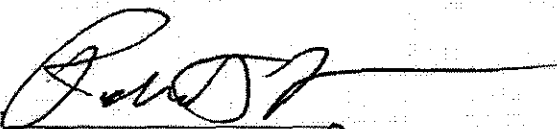
It is a violation of Telmate's policies to disclose CPNI outside of Telmate. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.

Access to CPNI at Telmate is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures that prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted

electronically.

Strict controls are in place involving responses to law enforcement agencies that serve Telmate with valid legal demands, such as a court ordered subpoena, for CPNI. Telmate will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.

Signature



Name:

Richard D. Torgerson / CEO

Date:

Feb 25, 2010

# **Summary of Actions Taken Against Databrokers by Telmate, LLC**

In compliance with 47.C.F.R § 64(e), I, Richard Torgersrud, acting on behalf of Telmate, LLC, summarize the actions that the Company has taken against databrokers within the last year:

**No actions have been taken against databrokers within the last year.**

# **Summary of Customer Complaints Received by Telmate, LLC**

In Compliance with 47 C.F.R. § 64.2009(e), I, Richard Torgersrud, acting on behalf of Telmate, LLC, provide a summary of customer complaints received with the last year:

1. Telmate has received no complaints as a result of improper access by employees.
2. Telmate has received no complaints as a result of improper disclosure to individuals not authorized to receive the information
3. Telmate has received no complaints as a result of instance of improper access to online information by individuals not authorized to view the information.
4. In addition, Telmate is aware of the processes pretexters are using to attempt to access CPNI, and what steps carriers are taking to protect CPNI.
5. Telmate received no customer complaints in 2009 concerning the unauthorized release or use of CPNI.